

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK-----x  
THE REPUBLIC OF RWANDA,

Plaintiff,

-against-

JUSEPH J. FERONE,  
FERONE & FERONE  
333 S. HEALEY AVENUE CORP.,

Defendants. -----x

07 Civ. 7663 (JSR)

**REPLY  
DECLARATION****DAVID B. WOLF**, declares and states:

1. I am a partner at the firm Cowan DeBaets Abrahams & Sheppard LLP, attorneys for the plaintiff The Republic of Rwanda in the above action and submit this declaration in further support of plaintiff's motion for an award of attorneys' fees against defendants and their attorney Alfred A. Delicata under 28 U.S.C. § 1927 and under the Court's inherent power.

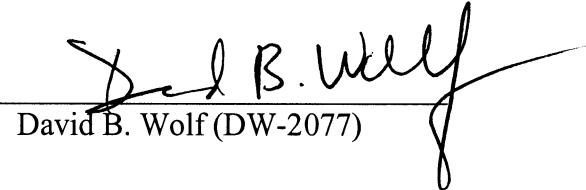
2. Attached hereto as Exhibit "A" is a true copy of my firm's invoice to the plaintiff covering the time spent in preparation of the instant motion. The amount of this invoice is \$3,782.50.

3. The total amount of the attorneys' fees requested on this motion is \$12,000, composed of the above amount, the amount of the invoice dated September 30, 2007 attached to my prior Declaration as Exhibit "B" (\$3,467.50), and the amount of the invoice attached to the Declaration of Robert F. Van Lierop as Exhibit "A" (\$4,750.00).

Dated: New York, New York

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 6, 2007

  
\_\_\_\_\_  
David B. Wolf (DW-2077)

# **EXHIBIT A**

# Cowan, DeBaets, Abrahams & Sheppard LLP

Attorneys at Law

41 Madison Avenue, New York, NY 10010  
 Tel: (212) 974-7474  
 Fax: (212) 974-8474  
 Web: www.cdas.com  
 E-Mail: cdas@cdas.com

Republic of Rwanda  
 H.E. Mr. Joseph Nsengimana  
 Ambassador/Permenent Representative  
 Permanent Mission of Republic of Rwanda to the United  
 Nations  
 124 East 39th Street  
 New York, NY 10016

Bill Date: November 1, 2007  
 Bill # 35980  
 Client # 04905 - 00001

**RE:**

Balance as of bill dated 09/30/2007	\$1,260.00
Payments received since last bill	1,260.00
Unpaid Balance forward	\$0.00

**FOR PROFESSIONAL SERVICES RENDERED**

		<u>Hrs.</u>	<u>Rate</u>	<u>Amount</u>
10/15/07 DBW	Fee motion.	1.50	425	637.50
10/16/07 DBW	Fee motion.	3.00	425	1,275.00
10/17/07 DBW	Fee motion	1.50	425	637.50
10/18/07 DBW	Fee motion.	1.50	425	637.50
10/19/07 DBW	Fee motion.	1.40	425	595.00
<b>TOTAL FEES FOR THIS MATTER</b>				<b>\$3,782.50</b>

**SUMMARY OF CHARGES ON THIS BILL** through October 19, 2007

<u>Init.</u>	<u>Name</u>	<u>Hrs.</u>	<u>Rate</u>	<u>Amount</u>
DBW		8.90	425	\$3,782.50
	Total fees	8.90		\$3,782.50
	Total charges for this bill			\$3,782.50
	Net current charges			\$3,782.50
	Less prepaid cash applied			\$3,782.50
	Net charges due			\$0.00
	<b>TOTAL BALANCE NOW DUE</b>			<b>\$0.00</b>
	* Your Prepaid Account Balance is:			\$1,957.50

**PROOF OF SERVICE**

I am employed in the County of New York, State of New York. I am over the age of 18 and not a party to the within action; my address is 1065 Gerard Avenue, Apt. #309, Bronx New York, 10452.

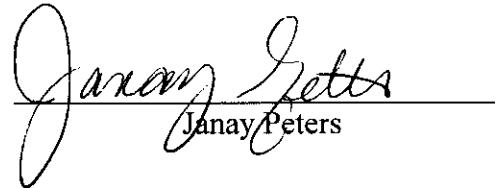
On November 7, 2007, I caused to be served, via e-mail, the following:

**REPLY DECLARATION IN FURTHER SUPPORT OF PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEYS' FEES.**

addressed as follows:

**Alfred A. Delicata, Esq.  
484 White Plains Road  
Eastchester, NY 10709  
italdel@aol.com**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at New York, New York on this 7<sup>th</sup> day of November, 2007.



Janay Peters